

## REMARKS

After entry of the above amendments, claims 1-3 and 5-15 are pending in this application. Applicants have amended claims 1, 6, 10 and 14. Claims 4 and 16 have been canceled after rewriting their limitations into claims 1, 6 and 10. No new matter has been added.

Claims 1-16 stand rejected under 35 USC 102(e) as anticipated by Haneda U.S. Patent No. 6,011,575. Applicants respectfully traverse this rejection with respect to the claims, as amended.

Amended claim 1 recites a number of elements in combination. An image forming apparatus includes an exposure unit that exposes an image carrier by emitting light of light emitting elements based on image data. Also included is an input device for inputting distortion data of the exposure unit and a controller that controls an exposure position of an image to be exposed by the exposure unit, based on the input distortion data. The input device is an operation panel operated by a user. Thus, the user may input distortion data during normal operation of the imaging apparatus.

The same combination of elements is neither disclosed nor suggested by Haneda. The Examiner asserts that Haneda's registration sensing means corresponds to the claimed input device and that image information is input from outside the apparatus. Applicants respectfully disagree.

Haneda discloses a registration sensing means RS by which the registration pattern formed on the circumference of the photoreceptor drum 10 is sensed (col. 9, lines 18-21). As described in Haneda, a registration pattern is formed on the circumference of the photoreceptor drum, which is then image-formed on image sensor RS1 (col. 9, lines 30-32). Element RS3 of Haneda is a light-emitting element that illuminates the registration pattern image from the interior (col. 9, lines 32-33). Haneda teaches that the registration pattern is stored in advance in ROM 252 (col. 9, lines 50-52). Further, Haneda discloses that inputting distortion data into

ROM is conducted when the apparatus is delivered from a factory or during overhaul (column 8, lines 59-62), and fails to disclose that inputting distortion data into ROM can be conducted during normal use of the imaging apparatus.

Additionally, even if Haneda teaches an input device for inputting image information, it does not teach an input device for inputting distortion data of the exposure unit where the input device is an operation panel operated by a user. The Examiner, previously in connection with claim 1, asserted that the registration sensing means corresponds to the claimed input device. However, the registration sensing means cannot, on one hand, correspond to the structure disclosed in Haneda and, on the other hand, correspond to the claimed operation panel operated by a user.

To anticipate a claim, the reference must teach every element of the claim. MPEP 2131. The standard for the anticipation analysis is that “[e]very element of the claimed invention must be literally present, arranged as in the claim. ... The identical invention must be shown in as complete detail as is contained in the patent claim.” *Richardson v. Suzuki Motor Co., Ltd.*, 868 F.2d 1226, 1236 (Fed. Cir. 1983).


Since Haneda fails to teach every element of claims 1, 6 and 10, Haneda fails to anticipate those claims. Thus, claims 1, 6 and 10 are patentable over the Haneda reference. This logic also disposes of the rejection of claims 2-3, 5, 7-9 and 11-15, which depend directly or indirectly from claims 1, 6 or 10.

In view of the above, entry of the amendments after final rejection is appropriate as the amendments place the application in condition for allowance or in better form for appeal. Accordingly, applicants solicit early action in the form of a Notice of Allowance.

In the event that the transmittal letter is separated from this document and the Patent and Trademark Office determines that an extension and/or other relief is required, applicants petition for any required relief including extensions of time and authorize the Commissioner to charge the cost of such petitions and/or other fees due in connection with the filing of this document to Deposit Account No. 03-1952 referencing Docket No. 325772022400.

Respectfully submitted,

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By:   
Brian N. Fletcher  
Registration No. 51,683

Morrison & Foerster LLP  
1650 Tysons Boulevard, Suite 400  
McLean, Virginia 22102  
Telephone: (703) 760-7796  
Facsimile: (703) 760-7777